

**TAYLOR COUNTY  
COURTHOUSE  
300 OAK STREET, SUITE 300  
ABILENE, TEXAS 79602-1577**



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JUDICIAL DISTRICTS OF TEXAS

PD-0880-16  
COURT OF CRIMINAL APPEALS  
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Transmitted 2/14/2017 3:47:43 PM  
FAX (325) 674-1306  
Accepted 2/16/2017 8:28:30 AM  
ABEL ACOSTA  
CLERK

FILED  
COURT OF CRIMINAL APPEALS  
2/16/2017  
ABEL ACOSTA, CLERK

February 14, 2017

Honorable Abel Acosta, Clerk  
Texas Court of Criminal Appeals  
PO Box 12308, Capitol Station  
Austin, Texas 78711

RE: Request for Oral Argument– PD-0880-16  
Ronald Edgar Lee, Jr. v. State of Texas  
Appellate Case Number: 11-14-00198-CR  
Trial Court Case Number: 19309-B

Dear Mr. Acosta:

In his brief on the merits filed in the Court on February 10, 2017, appellant states that although he did not initially request oral argument in his petition for discretionary review, he believes that it would help clarify the issues and wished to now request oral argument. The State also believes that oral argument would be helpful to the Court.

This case is one of first impression regarding the application of the territorial jurisdiction statute, Texas Penal Code § 1.04 (a)(1), to the offense of continuous sexual abuse of a child, Texas Penal Code § 21.02. Specifically, the question is whether Texas can exercise territorial jurisdiction over the acts of appellant in another state when exactly two acts of sexual abuse are alleged, one within and one outside of the state. Given the novel question presented the State believes that oral argument would be helpful to the Court.

Thank you very much for your time. If you need to contact me for any reason please do not hesitate to do so.

Sincerely,

/s/ Britt Lindsey

Britt Lindsey

Assistant District Attorney

CC: Stacey M. Soule, State Prosecuting Attorney  
Paul Hanneman, counsel for appellant